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RMI Company

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August 14, 1986

Rec'd
8/15/86
EPA

EXPRESS MAIL

Ms. Margaret McCue, 5PA-14
U.S. EPA Region V
RE: Public Comment on Fields Brook
230 South Dearborn Street
Chicago, Illinois 60604

Dear Ms. McCue:

RMI Company would like to submit at this time comments on the Feasibility Study - Fields Brook Site, July 3, 1986.

Most of the comments to the study were prepared by Aware Incorporated and are attached. However, from RMI's perspective, the three points listed below are considered to be the major issues:

- (1.) The sediment ingestion rate used in calculating the risk assessment for metals is a factor of 100 higher than those currently considered realistic. Dr. Kinbrough, whom CH₂M-Hill considers to be the final authority, has indicated that 0.1 grams per day is a more realistic estimate of the soil ingestion rate than those rates earlier published. Therefore cadmium and mercury (as well as other metals) cannot be used as a basis for remedial action at the brook.
- (2.) Excavation of the Route 11 Tributary is not warranted based on the analytical data used.
- (3.) Recently the Council on Environmental Quality promulgated regulations which rescinded the requirement to prepare a "worst case analysis" when preparing an Environmental Impact Statement (see Federal Register Vol. 51, No. 80, page 15618). Such a ruling should encourage the reappraisal of the basis of clean up set forth in the FS.



Ms. Margaret McCue, SPA-14
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August 14, 1986
Page 2

RMI humbly requests the opportunity to discuss these and other items with the Ohio and U.S. EPA at the earliest opportunity. If such is possible, please contact the author at (216) 544-7688.

Sincerely,

A handwritten signature in cursive script that reads "Joe T. Holman".

Joe T. Holman
Supervisor - Environmental Control

Attachments

cc: Mr. Kerry Street, U.S. EPA
Mr. Paul Hancock, Ohio Attorney General's Office
Mr. Roger Hannahs, Ohio EPA